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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$349,940.00 IN U.S.
CURRENCY,

15 APPROXIMATELY \$144,996.00 IN U.S.
16 CURRENCY,

17 APPROXIMATELY \$28,046.00 IN U.S.
CURRENCY,

18 APPROXIMATELY \$9,450.00 IN U.S.
19 CURRENCY,

20 APPROXIMATELY \$4,381.00 IN U.S.
CURRENCY,

21 APPROXIMATELY \$2,378.00 IN U.S.
22 CURRENCY, and

23 APPROXIMATELY \$2,020.00 IN U.S.
CURRENCY,

24 Defendants.
25

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

26 It is hereby stipulated by and between the United States of America and potential claimant
27 Alfredo Lopez Nevarez (“claimant”), by and through their respective counsel, as follows:
28

1 1. On or about October 31, 2024 claimant Alfredo Lopez Nevarez filed a claim in the
2 administrative forfeiture proceeding with the Drug Enforcement Administration (“DEA”) with respect to
3 the Approximately \$349,940.00 in U.S. Currency, Approximately \$144,996.00 in U.S. Currency,
4 Approximately \$28,046.00 in U.S. Currency, Approximately \$9,450.00 in U.S. Currency, Approximately
5 \$4,381.00 in U.S. Currency, Approximately \$2,378.00 in U.S. Currency, and Approximately \$2,020.00
6 in U.S. Currency, which were seized on August 22, 2024 (hereafter collectively the “defendant
7 currency”).

8 2. The DEA has sent the written notice of intent to forfeit required by 18 U.S.C. §
9 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
10 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a
11 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

12 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
13 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
14 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
15 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
16 parties. That deadline is January 29, 2025.

17 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April
18 29, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
19 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
20 forfeiture.

21 5. Accordingly, the parties agree that the deadline by which the United States shall be
22 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
23 alleging that the defendant currency is subject to forfeiture shall be extended to April 29, 2025.

24 Dated: January 23, 2025

MICHELE BECKWITH
Acting United States Attorney

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26 By: /s/ Kevin C. Khasigian
27 KEVIN C. KHASIGIAN
28 Assistant U.S. Attorney

Dated: January 23, 2025

/s/ Matt Koohanim
MATT KOOHANIM
Attorney for potential claimant
Alfredo Lopez Nevarez
(Original signature retained by attorney)

IT IS SO ORDERED.

Dated: _____

United States District Judge